

Federal Defenders OF NEW YORK, INC.

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton
*Executive Director
and Attorney-in-Chief*

*Southern District of New York
Jennifer L. Brown
Attorney-in-Charge*

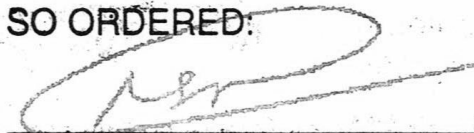
February 14, 2023

The Honorable Nelson S. Román
United States District Court Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Deft. has failed to present to the Court with a legal or medical basis which warrants the granting of her application seeking to further stay her surrender date to begin serving her sentence following her conviction. Accordingly, the application is DENIED. Clerk of Court is requested to terminate the motion at ECF No. 81.

Re: United States v. Vania Bell
19 CR 550 (NSR)

Dated: White Plains, NY **SO ORDERED:**
Feb. 14, 2023


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Honorable Román:

I am writing to ask that Your Honor please postpone Vania Bell's surrender date to early March. As you know, Ms. Bell's original surrender date was January 17, 2023, but, as detailed in my January 13th submission, on January 12, 2023, Ms. Bell [REDACTED]. See ECF # 75. As a result, Ms. Bell's surrender date was delayed until January 31, 2023. See ECF # 76. But Ms. Bell was still sick in late January, so Your Honor postponed Ms. Bell's surrender date to February 15, 2023. See ECF # 79.

Unfortunately, Ms. Bell continues to struggle from [REDACTED]. As detailed by Ms. Bell's doctor, Ms. Bell "[REDACTED]," and is suffering from "[REDACTED]." See February 14, 2023, Letter from Gabriela Wojnarska-Alvarez MD (Exhibit A). Due to her condition, Ms. Bell's physician has advised that she [REDACTED]. The doctor also opined that [REDACTED]. " Ms. Bell is also awaiting the results of a [REDACTED]. Id. [REDACTED]. Under these circumstances, and especially in light of Ms. Bell's pre-existing conditions,¹ as well as the [REDACTED]

¹ As noted in the PSR, Ms. Bell is [REDACTED]. PSR ¶ 77. According to [REDACTED]
[REDACTED]
[REDACTED]
(last assessed on February 13, 2023).

[REDACTED],² I ask that the Court please delay Ms. Bell's surrender until early March. This is essential both [REDACTED].

I have communicated with Margery Feinzig from the United States Attorney's Office and provided the Government with the attached documentation from Ms. Bell's physician, but I do not yet know the Government's position regarding this request.³

Thank you for your consideration of this request.

Sincerely,

//s

Benjamin Gold
Assistant Federal Defender

cc: Senior Litigation Counsel Margery Feinzig

² See [REDACTED].

³ This is not surprising, as I only received this attached letter at 1:14pm, so I do not know if the Government has even been able to review the e-mail that I sent.

Exhibit A

Letter from Gabriela Wojnarska-Alvarez, MD



DOCTORS
PRIMARY CARE AND NEPHROLOGY

HOSPITAL AFFILIATIONS:



2/14/2023

To Whom It May Concern:

My patient Vewe Bell DOB: [REDACTED]

[REDACTED]

[REDACTED]

221 West Grand Avenue • Montvale, NJ 07645

Phone (201) 746-1331 • Fax (201) 746- [REDACTED]

PCNMD.org

6, WOSNARSLA - AUVARZ